

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v -

Criminal Case No. 21-0080 (NGG)

DOUGLASS MACKEY,

Defendant.

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NOTICE OF MOTION

PLEASE TAKE NOTICE that Defendant Douglass Mackey will move this Court, upon the accompanying Memorandum of Law and all proceedings in this case to date, at a date and time to be set by the Court, for the following *in limine* and other relief:

- A. *The Government Must Comply with F. R. Cr. Pr. 5(f)*
- B. *The Court Should Not Require Jurors to be Vaccinated*
- C. *The Court Should Preclude the Government's Use of Protected Speech Preceding September 2016*
- D. *The Court Should Preclude Evidence that Fails to Satisfy the Requirements of F. R. Evid. 801(d)(2)(E)*
- E. *The Court Should Preclude Twitter's Reasons for Suspending Ricky Vaughn's Twitter Account and conclusions of MIT Media Lab About the Account's Popularity*
- F. *Even if the Congressmen Described in the Complaint is Relevant, the Court Should Preclude Evidence of His Identity*
- G. *The Court Should Preclude Inflammatory Language*

Dated: January 30, 2023

Respectfully submitted,

/s/ Andrew J. Frisch

Andrew J. Frisch

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